REMARKS/ARGUMENTS

Claims 2-4, 6-10, 12-14 and 16-20 remain in the present application, of which claims 2, 6, 12 and 16 are independent. None of the claims has been amended herein. Applicants respectfully request reconsideration and allowance of claims 2-4, 6-10, 12-14 and 16-20.

The Examiner has rejected claims 2-4, 6-10, 12-14 and 16-20 under 35 U.S.C. § 103(a) as allegedly being obvious over U.S. Patent No. 5,308,917 ("Kitamura et al.).

Regarding claims 2, 6, 12 and 16, the Examiner admits that "Kitamura does not specifically teach 'a correction coefficient generator which generates a correction coefficient composed of a ratio of one of the velocity values corresponding to one of touch data generated by keyboard under predetermined operation mode to a maximum value of velocity values.'" The Examiner also states that "Kitamura teaches determination of velocity data value VELO (LOOCNT) by interpolation in various ways (S52, S54, S56, S57 as shown in Fig. 11)." and that "Kitamura also teaches the determination of the maximum velocity value, Vmax of the touch curve as shown in col. 5, lines 35-43."

Further, the Examiner alleges that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to utilize Kitamura's velocity, VELO and maximum velocity, Vmax for the purpose of touch curve data generation. One would have been motivated in view of Kitamura that simply dividing the velocity, VELO by the maximum velocity, Vmax is mathematically and functionally equivalent to the desired correction coefficient." Applicants respectfully traverse because of at least the following reasons.

First of all, the technique disclosed by Kitamura et al. is interpolation, during which velocity values are subtracted from one

another. Applicants are not sure whether the interpolation technique disclosed by Kitamura et al. will work at all if one starts dividing velocity values by velocity values. In fact, none of the equations disclosed by Kitamura et al. appears to show such division.

Regarding claims 2, applicants respectfully submit that Kitamura et al. does not teach or suggest "a coefficient generator which generates a correction coefficient composed of a ratio of one of said velocity values corresponding to one of said touch data generated by said keyboard device under said predetermined operation mode to a maximum value of said velocity values," nor does it teach or suggest "a touch curve generator which multiplies said correction coefficient generated by said correction coefficient generator by said velocity values to generate the new touch curve."

According to MPEP § 706.02(j), "[t]o establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure." (emphasis added).

Applicants respectfully submit that applicants cannot find any reference in Kitamura et al. to such correction coefficient as in claims 2 and 12, nor can applicants find any reference to multiplying such correction coefficient by the velocity values to generate a new touch curve. As a matter of fact, Kitamura et al. appears to teach away from such multiplication between a correction coefficient and velocity values when FIGs. 8-11 and Col. 4, line 45 through Col. 5,

line 50 of Kitamura et al. are considered. By way of example, there are at least four values in each curve, namely, V MAX, VELO H, VELO M and VELO L, that do not appear to change during interpolation, when equations (1) - (4) are applied. When the velocity values are multiplied by the correction coefficient, that will not be the case because all the velocity values are adjusted by the correction coefficient.

Hence, not only does Kitamura et al. not teach or suggest at least the above recited limitations of claim 2, it appears to teach away from claim 2. Therefore, applicants respectfully submit that claim 2 would not have been obvious at the time of the present invention to those skilled in the art, and respectfully request that the rejection of claim 2 be withdrawn and that it be allowed.

Since claims 3 and 4 depend, directly or indirectly, from claim 2, they incorporate all the terms and limitations of claim 2 in addition to other limitations, which together further patentably distinguish them over the cited references. Therefore, applicants respectfully request that the rejection of claims 3 and 4 be withdrawn and that they be allowed.

Similarly, Kitamura et al. does not disclose "generating a correction coefficient composed of a ratio of one of said velocity values corresponding to one of said touch data generated in said touch curve generating step under said predetermined operation mode to a maximum value of said velocity values," nor does it disclose "multiplying said correction coefficient generated in said correction coefficient generating step by said velocity values to generate the new touch curve." Therefore, applicants respectfully submit that claim 12 would not have been obvious to those skilled in the art at the time of the present invention, and respectfully request that the rejection of claim 12 be withdrawn and that it be allowed.

Since claims 13 and 14 depend, directly or indirectly, from claim 12, they incorporate all the terms and limitations of claim 12 in addition to other limitations, which together further patentably distinguish them over the cited references. Therefore, applicants respectfully request that the rejection of claims 13 and 14 be withdrawn and that they be allowed.

The Examiner has rejected claims 6 and 16 apparently without citing any portions of Kitamura et al. that are relevant to specific limitations thereof. In fact, the Examiner appears to have rejected these claims using the same arguments as claims 2 and 12. However, claims 6 and 16 have limitations that are different from the limitations of claims 2 and 12, as well as being patentably distinguishable over Kitamura et al. For example, regarding claim 6, the Examiner does not address in the Office Action as to how the limitation of "when a correction value corresponding to said touch data generated by said keyboard device under said predetermined operation mode is different from a predetermined standard value, corrects said correction curve stored in said correction curve memory such that said correction value replaces the predetermined standard value" is taught or suggested by any of the cited references. Hence, applicants respectfully submit that the rejection of claims 6 should be withdrawn since a claim limitation is neither taught nor suggested by the cited references, and no reason for rejecting claim 6 appears to be in the Office Action.

Since claims 7-10 depend, directly or indirectly, from claim 6, they incorporate all the terms and limitations of claim 6 in addition to other limitations, which together further patentably distinguish them over the cited references. Therefore, applicants respectfully request that the rejection of claims 7-10 be withdrawn and that they be allowed.

Kitamura et al. does not teach or suggest "when a correction value corresponding to said touch data generated by said keyboard device under said predetermined operation mode is different from a predetermined standard value, corrects said stored correction curve such that said correction value replaces the predetermined standard value," as recited in claim 16. Therefore, it is not seen how the subject of claim 16 could be obvious at the time of the present invention in view of Kitamura et al. Applicants respectfully request that the rejection of claim 16 be withdrawn and that it be allowed.

Since claims 17-20 depend, directly or indirectly, from claim 16, they incorporate all the terms and limitations of claim 16 in addition to other limitations, which together further patentably distinguish them over the cited references. Therefore, applicants respectfully request that the rejection of claims 17-20 be withdrawn and that they be allowed.

In view of the foregoing remarks, applicants respectfully request that the rejection of claims 2-4, 6-10, 12-14 and 16-20 be withdrawn, and that claims 2-4, 6-10, 12-14 and 16-20 be allowed. If there are any remaining issues that can be addressed over the telephone, the Examiner is invited to call applicants' attorney at the number listed below.

Respectfully submitted,

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